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- I, Katie M. Charleston, declare as follows:
- 1. I am the attorney of record for Plaintiff Demetrious Polychron ("Plaintiff"). I have personal knowledge of the matters contained in this declaration, and if called as a witness to testify, I could and would competently testify to them.
- 2. On August 31, 2023, I filed a motion to withdraw from this matter due to the breakdown of the attorney-client relationship and the failure of the Plaintiff to make payments for services rendered, thereby causing a financial hardship.
- 3. To date, the Court has not issued an order. The Motion remains set for hearing on October 2, 2023.
- 4. On September 8, 2023, Defense counsel filed their motion for attorneys' fees, currently set for October 16, 2023.
 - 5. Plaintiff's opposition to this motion is due on September 25, 2023.
- 6. The undersigned seeks a continuance on the hearing as set and the Plaintiff's time to respond for 30 days, following the Court's ruling on the undersigned's motion to withdraw.
- 7. The undersigned cannot continue to represent the interests of Plaintiff due to the breakdown of the attorney-client relationship and the financial hardship that Plaintiff's counsel has and will continue to suffer in further representation.
- 8. The undersigned seeks to protect the Plaintiff's interests and his ability to defend the filed motion pro se or with the assistance of another attorney.
- 9. Defendants counsel was contacted regarding this continuance, and they have no objection.
- 10. For these reasons, the undersigned requests a continuance of the hearing on the Defendants' Motion for Attorney fees and the Plaintiff's time to respond.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: September 22, 2023 /s/ Katie Charleston

Katie Charleston, Esq.

DECLARATION OF KATIE CHARLESTON